

**THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ANGELA BROWN, *et al.*

Case No.: 1:22-cv-01455-KPF

Plaintiffs,

COLLECTIVE ACTION

v.

**PLAINTIFF KAYLE
RODRIGUEZ’S NOTICE OF
ACCEPTANCE OF
DEFENDANTS’ OFFER OF
JUDGMENT PURSUANT TO
FEDERAL RULE OF CIVIL
PROCEDURE 68**

PEREGRINE ENTERPRISES, INC.
dba RICK’S CABARET NEW
YORK, a New York corporation; RCI
ENTERTAINMENT (NEW YORK)
INC., a New York corporation; RCI
HOSPITALITY HOLDINGS, INC.
fka RICK’S CABARETI
NTERNATIONAL, INC., a Texas
corporation; RCI MANAGEMENT
SERVICES, a Texas corporation;
ERIC LANGAN, an individual; ED
ANAKAR, an individual; DOE
MANAGERS 1-3; and DOES 4-10,
inclusive,

Defendants.

COMES NOW plaintiff Kayle Rodriguez (“Plaintiff” and “Ms. Rodriguez”) by and through undersigned counsel, and submits Plaintiff’s Notice of Acceptance of defendants Peregrine Enterprises, Inc. dba Rick’s Cabaret New York, RCI Entertainment (New York), Inc., RCI Hospitality Holdings, Inc. fka Rick’s Cabaret International, Inc., RCI Management Services, Eric Langan, and Ed Anakar’s (collectively, “Defendants”) Offer of Judgment pursuant to Federal Rule of Civil Procedure 68 as follows:

1. Plaintiff Kayle Rodriguez commenced this collective action on February 22, 2022. *See* Dkt. 1.

2. On April 3, 2023, Defendants served plaintiff Kayle Rodriguez with an Offer of Judgment pursuant to Federal Rule of Civil Procedure 68 in the amount of \$6,553.19 to Plaintiff as full compensation for all fees and costs incurred in this action. A true and correct copy of Plaintiff Kayle Rodriguez's Offer of Judgment is attached hereto as **Exhibit 1**.

3. This acceptance of offer of judgment extinguishes only Ms. Rodriguez's claims in this action. However, twenty-one other opt-in plaintiffs (Angela Brown, Giselle Luza, Lauren Farano, Marley Blangiardo, Rebecca Branson, Zuleyka Bula, Maria Cardenas, Coral Ann Hall, Raina Bigham, Elena Malysheva, Teresa Leja, Lisa Sdrigotti, Leslie Tejeda, Kayla Urena, Yana Toyber, Kianna Francis, Maryanny Manan, Janice Valdez, Tracie Middleton, Gabriela Chan, and Ashley Venecia) continue to prosecute their claims before this Court.

///

///

///

///

///

///

///

///

///

///

///

written notice of her acceptance of the offer via the Court's CM/ECF electronic filing system to Defendants' attorneys of record.

Respectfully Submitted,

Dated: 4/13/2023

CARPENTER & ZUCKERMAN



John P. Kristensen (*Pro Hac Vice*)
Frank M. Mihalic, Jr. (*Pro Hac Vice*)
Justice D. Turner (*Pro Hac Vice*)

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I certify that on Thursday, April 13, 2023 a true and correct copy of the attached
**PLAINTIFF KAYLE RODRIGUEZ'S NOTICE OF ACCEPTANCE OF DEFENDANTS'
OFFER OF JUDGMENT PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 68**
was served via CM/ECF upon the following parties pursuant to Rule 5 of the Federal Rules of
Civil Procedure:

Jeffrey A. Kimmel
M. Adil Yaqoob
AKERMAN LLP
1251 Avenue of the Americas, 37th Floor
New York, NY 10020
Email: *jeffrey.kimmel@akerman.com*
Email: *adil.yaqoob@akerman.com*

Counsel for Defendants

/s/ John P. Kristensen

John P. Kristensen